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Before the

FEDERAL COMMUNICATIONS COMMISSION

JUN 16 1993

Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Applications of

1 MM Docket No. 93-75 /

November 29, 1993, as the Presiding Judge directed at the initial prehearing conference.

2. For the reasons stated in the Joint Report, the parties respectfully request that the date for filing objections pursuant to §1.325(a)(2) of the Rules to requests for production of documents be extended to and including July 21, 1993. That rule provides that all objections to requested documents should be filed within 10 days of the request and must include all assertions of privilege. However, before a party's objections based on privilege and other grounds can be prepared, the party must first review each requested document to determine whether a privilege or other objection applies. Here, the document production requests encompass more than 160 separate categories of documents that span a period of nearly 14 years. Moreover, the parties who are principally responsible for producing those documents report that the documents are located in more than 30 different jurisdictions throughout the country and that obtaining them requires contacting many principals, agents, and other individuals who were custodians of the documents over the 14-year period involved. See Joint Report, pp. 2-3 and 5.

~~2. Given the vast number of requested documents, the~~

a schedule of privileged documents within the very brief 10-day period specified in §1.325(a)(2). The parties believe that July 21, 1993, is the earliest date that is realistically feasible for that process to be completed. As stated in the Joint Report, pursuant to the parties' proposed schedule, the requested date for objections to document requests will not delay commencement of the hearing beyond November 29, 1993.

For the foregoing reasons, the parties respectfully request that the date for filing objections to the requests for production of documents that have been served be extended to and

TRINITY CHRISTIAN CENTER OF SANTA ANA,
INC. D/B/A TRINITY BROADCASTING NETWORK

By:

Howard A. Topel
Colby M. May
Joseph E. Dunne III
Nathaniel F. Emmons
Howard A. Topel
Its Attorneys

GLENDAL E BROADCASTING COMPANY

By:

Lewis I. Cohen
John J. Schauble
Its Attorneys

SPANISH AMERICAN LEAGUE AGAINST
DISCRIMINATION

By:

David Honig
Its Attorney

HEARING BRANCH, MASS MEDIA BUREAU

By:

James Shook
Gary Schonman
Its Attorneys

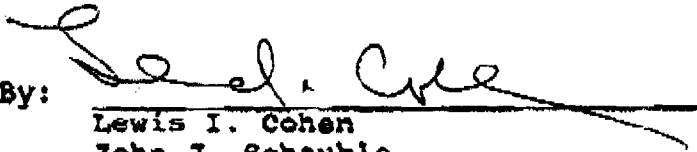
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MULLIN, RHYNE

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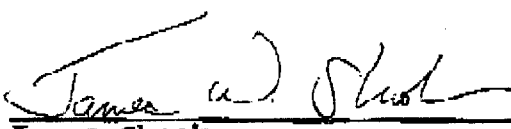
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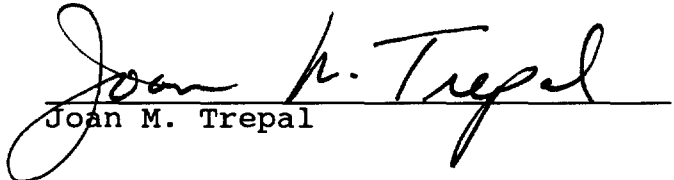
CERTIFICATE OF SERVICE

I, Joan M. Trepal, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, hereby certify that on this 16th day of June, 1993, copies of the foregoing "Joint Motion For Extension of Time" were sent by first class mail, postage prepaid, to the following:

- * The Honorable Joseph Chachkin
Administrative Law Judge
Federal Communications Commission
2000 L Street, N.W.--Room 226
Washington, D.C. 20554

 - * James Shook, Esq.
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.--Room 7212
Washington, D.C. 20554

 - * Lewis I. Cohen, Esq.
John J. Schauble, Esq.
Cohen & Berfield
1129 20th Street, N.W.
Washington, D.C. 20036
- David E. Honig, Esq.
1800 N.W. 187th Street
Miami, FL 33056


Joan M. Trepal

* Hand Delivered.